

DECLARATION OF JEFERSON ESCALONA

I, Jeferson Escalona, hereby declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the following is true and correct.

1. I came to the United States from Venezuela in March 2024 to seek asylum. I tried to get an appointment through CBP One, but after being unable to do so, I entered the country without inspection and turned myself in to U.S. authorities.
2. In November 2024, I was detained in the Prairieland Detention Facility in Alvarado, Texas, before being sent to the El Paso Processing Center in January 2025. I had an order of deportation and was scheduled to appear in court on February 2025, but I did not have an attorney. I had been trying to save money to hire one before my detention, but I could not afford it.
3. On February 8, 2025, I was transferred from El Paso Processing Center to Guantánamo Bay, Cuba. I was told I was being taken to Florida, but instead, they put me on a military plane and took me straight to Guantánamo. I had already seen on the news that other Venezuelans were being sent there, so when I realized I was on a military flight, I knew where I was going.
4. When we arrived, the guards forced us to undergo a humiliating strip search. They said it was protocol, but it felt more like abuse. We were made to strip naked, go one by one into the shower, and spread our buttocks while they inspected us. The guards touched us during the search. One man refused to comply, and they stripped him down to his boxers and chained him to a chair.
5. The conditions at Guantánamo were horrible. I was locked alone in a tiny cell with no window, no way to know if it was day or night. The lights were always on, making sleep nearly impossible. It was freezing, and all I had was a thin blanket. I was never given a mattress the entire time I was there.
6. I was never let out of my cell, except twice for a shower. I was shackled and chained just to go wash myself. Others who had been there longer told me that when they were finally allowed outside, it wasn't really outside. It was just another cage, within a larger cage, and they were still unable to speak to anyone.
7. The food was awful, barely enough to survive, and it made me feel weak all the time, but I ate because I did not want to die of starvation. I lost about ten pounds in just a few days.
8. I could not sleep. I went three nights without rest, no matter how exhausted I was. I asked for help, and they gave me pills, but they had no effect. One night, they gave me five pills, and I still could not sleep. I was consumed by fear, thinking I would never leave,

that I would never see my mother again. The isolation was unbearable. I stayed in bed all day, not speaking to anyone. It felt like I had already disappeared from the world.

9. I was never given the opportunity to call my family or an attorney. I asked, and they told me there were no phones. Then they said maybe there would be phones the next week, but it was always an empty promise.
10. On February 13 or 14, 2025, officers came to my cell in the morning and told me I was being taken back to the United States because my immigration case had been reopened. I was relieved—I felt like I was finally being returned to civilization. I was flown back to Texas alone, without any other detainees on the flight.
11. Guantánamo was worse than any other detention facility. It was a maximum-security prison meant for terrorists. There was no movement, no way to speak to anyone, nothing but isolation. In the U.S., even in detention, I can walk around, talk to people, and have access to basic necessities. But in Guantánamo, there was nothing. It felt like they wanted us to disappear.
12. Because I am currently in detention at Bluebonnet and without stable internet connection, I could not sign this declaration myself but gave consent to Talia Roma to sign on my behalf.

Executed on the 28th day of February, 2025 at El Paso, Texas.

/s/ Jeferson Escalona

Jeferson Escalona

ATTESTATION AND CERTIFICATE OF TRANSLATION

I, Talia Roma, certify that I am fluent in both English and Spanish. On February 28, 2025, I personally spoke with Jeferson Escalona and read the foregoing declaration to him, translated into Spanish faithfully and accurately, over the phone. Mr. Escalona affirmed that he understood my translation and that the information in the above declaration is true and accurate.

Due to Mr. Escalona being in detention, it was not possible to obtain a written signature on the above declaration. In addition to confirming that the information in the above declaration is true, Mr. Escalona also gave me verbal consent to sign on his behalf.

I declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the foregoing is true and correct.



Talia Roma
Paralegal
American Civil Liberties Union Foundation
Immigrants' Rights Project
425 California Street, 7th Floor
San Francisco, CA 94609
(415) 343-0770
troma@aclu.org